



# Substantial Improvement/ Substantial Damage Desk Reference

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**FEMA**

- If the FIRM has been revised and the SFHA has widened to include more area, that area is now subject to the NFIP requirements. For example, areas that were previously designated X zone may now be shown as A zone or V zone. Improvements and repairs to buildings that were outside of the SFHA but are now in the revised SFHA must be evaluated to determine if the work is SI/SD.
- If the FIRM has been revised and the flood zone or BFE changed, a determination that work is a substantial improvement requires that the building meet NFIP requirements for new construction based on the revised flood zone and revised BFE.
- If the FIRM has been revised and either the floodway boundaries are changed or a floodway is newly delineated, a determination that improvements or repairs to a building are SI/SD may require an encroachment analysis.

## 6.5 Requirements for Certain Structures

This section describes how SI/SD is addressed for certain types of buildings in accordance with the NFIP floodplain management requirements, including:

- Historic structures (Section 6.5.1)
- Manufactured homes (Section 6.5.2)
- Accessory structures and certain agricultural structures (Section 6.5.3)

### 6.5.1 Historic Structures

The NFIP gives special consideration to the unique value of designated historic buildings and structures. Provided such structures retain their designations, communities do not have to require them to be brought into compliance if they will be substantially improved or have been substantially damaged. Section 3.4.1 includes the NFIP's definition for "historic structures." The term includes structures that are: (1) listed or preliminarily determined to be eligible for listing in the National Register of Historic Places; (2) certified or preliminarily determined by the Secretary of the U.S. Department of Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined to qualify as a registered historic district; or (3) designated as historic site under a State or local historic preservation program that is approved by the Secretary of the U.S. Department of Interior. The definition does not include structures that are merely old, those that residents refer to as historic, or those that happen to be located in historic districts.

The NFIP floodplain management requirements contain two provisions that are intended to provide relief for historic structures located in SFHAs:

- (1) The NFIP definition of "substantial improvement" includes the following exclusion for historic structures: "*Any alteration of a 'historic structure,' provided that the alteration will not preclude the structure's continued designation as an 'historic structure.'*" The exclusion also applies to historic structures that have been substantially damaged. This provision allows communities to exempt historic structures from the SI/SD requirements of the NFIP.